

1 STEVEN G. KALAR
Federal Public Defender
2 ELIZABETH M. FALK
Assistant Federal Public Defender
3 19th Floor Federal Building
450 Golden Gate Avenue
4 San Francisco, CA 94102
(415) 436-7700
5
6 Counsel for Defendant BUSHNELL

7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA
9

10 UNITED STATES OF AMERICA,)	No. CR 13-203 MMC
)	
11 Plaintiff,)	STIPULATION AND PROPOSED
)	ORDER TEMPORARILY MODIFYING
12 v.)	IN-DISTRICT BOND CONDITIONS
)	
13 RANDALL EDWARD BUSHNELL,)	
)	Court: The Honorable Laurel Beeler
14 Defendant.)	
)	

15
16 The parties hereby stipulate and agree as follows:

- 17
- 18 1. Defendant Randall Bushnell hereby requests permission to temporarily modify his
19 bond conditions for the purpose of moving some of his belongings to his mother's
20 house in Los Angeles prior to surrendering for a custodial sentence;
 - 21 2. Defendant Randall Bushnell thus requests this Court to modify the bond condition
22 requiring him to remain in the Northern District of California between May 8,
23 2013 and May 13, 2013 to allow for travel to the Central District of California.
24 Specifically, Mr. Bushnell requests permission to leave the district by car on
25 Wednesday, May 8, 2013 - to drive to Los Angeles, California and reside for the
26 nights of May 8, 2013 through May 12, 2013, 2013 at the home of his mother,

1 Sandra Bushnell, at 5757 Ravenspur Road in Los Angeles, CA, 90274. He would
2 return to this district Monday, May 13, 2013;

3 3. In so requesting a stay of that bond condition, defendant Randall Bushnell hereby
4 attests that he will 1) provide Pretrial Services with an exact itinerary of his trip,
5 including the method and mode of transportation; 2) keep in telephone contact
6 with U.S. Pretrial Services on a daily basis while out of the district, and provide
7 all location and contact information daily, and 3) cooperate with Pretrial Services
8 by providing any and all additional information requested by that agency
9 regarding his travel plans, travel locations, and contact information while
10 traveling;

11 4. United States Pretrial Services Officer Gelareh Farahmand has been consulted
12 regarding this stipulation. She has no objection to the proposed modification
13 provided that the defendant promises to comply and does comply with the
14 aforementioned conditions stated in Paragraph 3, above;

15 5. The government has also been consulted about this request. As indicated by the
16 signature below, there is no opposition to the proposed modification of pre-
17 surrender bond terms.

18 IT IS SO STIPULATED.

19 Dated: May 8, 2013

20
21 /S/
ELIZABETH M. FALK
22 ASSISTANT FEDERAL PUBLIC DEFENDER

23
24 Dated: May 8, 2013 /S/
25 STACEY GEIS
26 ASSISTANT UNITED STATES ATTORNEY

1 **~~[PROPOSED]~~ ORDER**

2 For the reasons set forth above, the bond conditions of Randall Bushnell are hereby
3 modified between May 8, 2013 and May 13, 2013 as follows:

4 1. The condition requiring the defendant to remain in the Northern District of California
5 is hereby MODIFIED to include and allow travel within the Central District of California on
6 between May 8 and May 13, 2013;

7 2. Defendant Randall Bushnell is required, as a condition of this modification, to 1)
8 provide Pretrial Services with an itinerary of his trip, including the method and mode of
9 transportation, proposed dates of travel, and the locations he anticipates visiting, 2) keep in
10 telephone contact with U.S. Pretrial Services on a daily basis while out of the district, and
11 provide all location and contact information daily, and 3) cooperate with Pretrial Services by
12 providing any and all additional information requested by that agency regarding his travel plans,
13 travel locations, and contact information while traveling;

14 3. This modification of bond conditions will terminate on May 13, 2013.

15 **IT IS SO ORDERED.**

16
17 DATED: May 8, 2013

18 
19 THE HONORABLE LAUREL BEELER
20 UNITED STATES MAGISTRATE JUDGE
21
22
23
24
25
26